

This correspondence contains comments on Petition RM-10869 submitted by Ronald D. Lowrance and received by the Commission on September 8, 2003. With this petition, Mr. Lowrance is asking the Commission to modify licensing requirements within the Amateur Radio Service, principally with respect to the telegraphy requirement.

I do not support this petition because I do not believe "proficiency in Morse Code (CW) for Amateurs is a Key component of communication for our community service responsibilities under and within [the] Department of Homeland Security (DHS)". I also do not agree with his subsequent statements identifying the utility of, and necessary proficiency for, emergency communication via Morse code.

I am unaware of any legislation related to, or agency directive or request originating from, the Department of Homeland Security (or any other government agency) that states the necessity for Morse code and the specifications for its use in civil emergency communication, particularly with respect to the Amateur Radio Service. If there are such laws, directives or requests, they should have been cited. Furthermore, I know of no public-service communication system that employs Morse code, and I know of no case in recent years where amateur radio operators have made significant use of Morse code while providing emergency communication. If there are, the petitioner should have cited them as well.

I am a radio amateur (call sign K3WQ) who enjoys operating with Morse code; nevertheless, I recognize that proficiency in manual radiotelegraphy is an arcane skill and view its use primarily as a pastime.

Although submitted with good intention, Petition RM-10869 is baseless. The Commission should direct its attention to other petitions currently open to public comment that address the same issues, but are better prepared.

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Bethesda, Maryland
March 26, 2004